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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Michelle M. Bays,  Plaintiff,  v.  Frontier Financial Credit Union, Experian Information Solutions, Inc. and Trans Union LLC,  Defendants.	Case No.: 3:16-cv-00656-HDM-WGC ORDER GRANTING <b>Stipulation for Extension of Time to Respond to Pending Motions</b>
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Plaintiff Michelle M. Bays (“Plaintiff”) and Defendant Frontier Financial Credit Union (“Defendant”) (jointly as the “Parties”), by and through counsel, stipulate for a 14 day extension of time for Plaintiff to respond to Defendant’s

1 Motion to Dismiss, ECF No. 22, and Motion to Abstain, ECF No. 23. Defendant  
2 filed its motions on December 2, 2016.

3 Plaintiff has requested in good faith and not for the purpose of delay, and  
4 Defendant agrees, for an additional 14 days to file oppositions to the motions  
5 because of the upcoming holidays and counsel's schedule. This is the first request  
6 for an extension of this deadline.

7 THEREFORE, it is hereby stipulated by the Parties as follows:

- 8 (1) Plaintiff shall respond to Defendant's Motion to Dismiss for Lack of  
9 Subject Matter Jurisdiction, ECF No. 22, on or before **January 2, 2017**;  
10 and  
11 (2) Plaintiff shall respond to Defendant's Motion to Abstain, ECF No. 23,  
12 on or before **January 2, 2017**.

13 DATED this 19th day of December 2016.

14 KAZEROUNI LAW GROUP, APC

15 By: /s/ Michael Kind

16 Michael Kind, Esq.

17 7854 W. Sahara Avenue

18 Las Vegas, NV 89117

19 *Attorney for Plaintiff*

20 MICHAEL LEHNERS

21 By: /s/ Michael Lehnerns

22 Michael Lehnerns, Esq.

23 429 Marsh Ave.

24 Reno, Nevada 89509

25 *Attorney for Defendant Frontier Financial Credit Union*

26 IT IS SO ORDERED:

27 

28 UNITED STATES DISTRICT JUDGE

DATED: December 20, 2016

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on December 19, 2016, the foregoing Stipulation for Extension of Time to Respond to Pending Motions was filed and served via CM/ECF on all parties appearing in this case.

**KAZEROUNI LAW GROUP, APC**

By: /s/ Michael Kind  
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